

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

HOLIDAY HOSPITALITY  
FRANCHISING, LLC,

Plaintiff,

v.

RICK Q. LY a/k/a RICHARD QUAN LY,

Defendant.

**Civil Action No.:**

**CERTIFICATE OF INTERESTED PERSONS AND CORPORATE  
DISCLOSURE STATEMENT**

(1) The undersigned counsel of record for a party or proposed intervenor to this action certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

**a) Holiday Hospitality Franchising, LLC.**

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having

either a financial interest in or other interest which could be substantially affected by the outcome of this case:

**a) N/A**

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

**a) Michael W. Tyler  
Brittany Herbert  
Bennett T. Richardson  
Kilpatrick Townsend & Stockton LLP  
1100 Peachtree Street, Suite 2800  
Atlanta, GA 30309-4530  
Attorneys for the Plaintiff**

**b) Matthew R. Rosenkoff  
Michael S. Rosenthal  
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1600 Parkwood Circle, Suite 200  
Atlanta, GA 30339  
Attorneys for Defendant**

(4) For every action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a). The undersigned further certifies that the following is a full and complete list of the citizenship of every individual or entity whose citizenship is attributed to

a party or proposed intervenor on whose behalf this certificate is filed<sup>1</sup>:

- **Holiday Hospitality Franchising, LLC, Delaware.** Upon information and belief, based on prior filings in this Court, Holiday Hospitality Franchising has a single member, Six Continents Hotels, Inc., a corporation organized under the laws of Delaware, with its principal place of business in Atlanta. See Holiday Hospitality Franchising, LLC v. Holtsville Hospitality, LLC, et. al., Case No. 1:16-cv-00828-TWT, Dkt. 1; see also Holiday Hospitality Franchising, LLC v. Northern Riverfront Marina and Hotel, LLLP, et. al., Case No. 1:21-cv-02584-TWT, Dkt. 1. In any event, upon information and belief, no member of Holiday Hospitality Franchising is a citizen of Mississippi.
- **Defendant, RICK Q. LY a/k/a RICHARD QUAN LY, Mississippi.**

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<sup>1</sup> Allegations of an individual's residence do not enable the Court to determine an individual's citizenship. Travaglio v. Am. Express Co., 735 F.3d 1266, 1269 (11th Cir. 2013). For purposes of diversity jurisdiction, citizenship is equivalent to domicile, which is a party's "true, fixed, and permanent home and principal establishment, and to which he has the intention of returning whenever he is absent therefrom." McCormick v. Aderholt, 293 F.3d 1254, 1257–58 (11th Cir. 2002) (quoting Mas v. Perry, 489 F.2d 1396, 1399 (5th Cir. 1974)). "[A] limited partnership is a citizen of each state in which any of its partners, limited or general, are citizens." Rolling Greens MHP, L.P. v. Comcast SCH Holdings L.L.C., 374 F.3d 1020, 1021 (11th Cir. 2004) (citing Carden v. Arkoma Assocs., 494 U.S. 185, 195-196 (1990)). A limited liability company, like other unincorporated entities, "is a citizen of any state of which a member of the company is a citizen." Rolling Greens MHP, 374 F.3d at 1022. A traditional trust is a citizen of the state of which its trustee is a citizen, not its beneficiaries. Alliant Tax Credit 31, Inc. v. Murphy, 924 F.3d 1134, 1143 (11th Cir. 2019).

Respectfully submitted,

Date: September 14, 2023

**TAYLOR ENGLISH DUMA LLP**

/s/ Matthew R. Rosenkoff  
Matthew R. Rosenkoff, Esq.  
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*Attorneys for Defendant*

**LOCAL RULE 7.1D CERTIFICATION**

I hereby certify that the foregoing complies with the font and point requirements of LR 5.1, to wit, the foregoing was prepared in Times New Roman font, 14-point type.

**TAYLOR ENGLISH DUMA LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of September, 2023, a copy of the foregoing was filed via CM/ECF and served upon counsel of record via electronic notification.

/s/ Matthew R. Rosenkoff  
Matthew R. Rosenkoff, Esq.  
Georgia Bar No. 842117